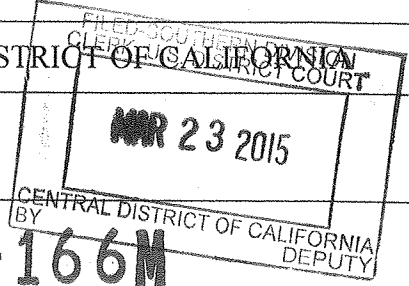



CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT		CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v. JEREMY WILLIAMS		DOCKET NO.	
		MAGISTRATE'S CASE NO. SA 15-166M	
Complaint for violation of Title 18, United States Code, Section 471.			
NAME OF MAGISTRATE JUDGE HONORABLE JAY C. GANDHI		UNITED STATES MAGISTRATE JUDGE	LOCATION Santa Ana, California
DATE OF OFFENSE March 2015	PLACE OF OFFENSE Orange County	ADDRESS OF ACCUSED (IF KNOWN)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: In or about March 2015, within the Central District of California, defendant JEREMY WILLIAMS, with the intent to defraud, counterfeited \$100s, \$50s, \$20s, \$10s, and \$5s Federal Reserve Notes in violation of Title 18, United States Code, Section 471.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: (See attached affidavit which is incorporated as part of this Complaint)			
MATERIAL WITNESSES IN RELATION TO THIS CHARGE: N/A			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT  JASON WARREN	
		OFFICIAL TITLE Special Agent – United States Secret Service	
Sworn to before me and subscribed in my presence,			
SIGNATURE OF MAGISTRATE JUDGE ⁽¹⁾ Jay C. Gandhi			DATE March 23, 2015

⁽¹⁾ See Federal Rules of Criminal Procedure 3 and 54

AUSA J. WAIVER



AFFIDAVIT

I, Special Agent Jason Warren, being duly sworn and under oath, hereby depose and say:

1. I am a Special Agent ("SA") with the United States Secret Service ("USSS") and have been so employed since June, 1999. Before beginning active duty with the USSS at the Santa Ana Resident Office, I completed two separate criminal investigator training programs. These programs (Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, GA and the Special Agent Training Program at the James J. Rowley Training Center located in Beltsville, MD) both covered instruction in the investigation of violations of federal criminal law. As an agent, I have also received on-the-job training in the investigation of counterfeiting, access device fraud, embezzlement, identity theft and bank fraud cases.

2. This affidavit is made in support of a criminal complaint against JEREMY WILLIAMS for violating Title 18, United States Code, Section 471 (Manufacturing Counterfeit United States Currency).

3. The facts set forth in this affidavit are based on my personal observations, training, experience, and information obtained from other law enforcement agents/officers and witnesses. This affidavit is intended to show that there is

probable cause for the requested complaint and does not purport to set forth all of my knowledge or investigation into this matter.

FACTS ESTABLISHING PROBABLE CAUSE

4. On March 20, 2015, I met with Orange County Sheriff's Department ("OCSD") Detective Scott Yuen at the San Clemente Police Department. Detective Yuen explained that two suspects, identified as JEREMY WILLIAMS and JULIA WILLIAMS, were detained by OCSD Officers earlier that same morning for possession of counterfeit currency, driver's licenses, checks, and identity theft-related information. During this meeting with Detective Yuen, he provided me with a report detailing the facts and circumstances of this investigation. From a review of this report and discussions with Detective Yuen, I learned the following information:

a. OCSD Officers made contact with JULIA WILLIAMS after they observed her riding a bicycle in the dark without the required reflective lighting. Upon speaking with JULIA WILLIAMS, she told Officers that she was currently on probation and subject to search and seizure.

b. JULIA WILLIAMS told OCSD Officers that she was currently staying at the Surf Hotel, located at 3019 El Camino Real, San Clemente, Room 103.

c. When OCSD Officers went to room #103 of the Surf Hotel, JEREMY WILLIAMS answered the door. With JULIA WILLIAMS' and JEREMY WILLIAMS' consent, OCSD Officers conducted a search of room #103. During this search, they located approximately \$1,500 in counterfeit United States currency in various stages of manufacturing, several counterfeit drivers' license bearing the photograph of JULIA WILLIAMS, counterfeit checks, several profiles containing personal identifying information of various individuals, along with computers, and a printer/scanner. The counterfeit currency were in all denominations, including \$100s, \$50s, \$20s, \$10s, and \$5s. OCSD Detectives also located counterfeit checks with victim names that matched the names on the counterfeit driver's license bearing the photograph of JULIA WILLIAMS.

5. After the search, OCSD Officers interviewed JULIA WILLIAMS and JEREMY WILLIAMS. According to OCSD Detectives, both suspects were interviewed separately and agreed to speak with OCSD after they were read their Miranda Rights. The following is a summary of what JEREMY WILLIAMS and JULIA WILLIAMS told OCSD Detectives during their respective interviews:


a. JEREMY WILLIAMS is married to JULIA WILLIAMS. JEREMY WILLIAMS told Officers that he made the counterfeit currency on a scanner that was recovered during the search of

the motel room. JULIA WILLIAMS said that she and JEREMY WILLIAMS made the fraudulent identification and counterfeit checks in order to make money so they could live. Both stated that they received the stolen profiles from a person, but did not provide any additional specific information regarding that individual. JULIA WILLIAMS also said that she used a counterfeit identification in the name of T.W. along with a counterfeit check in that same name the previous night at a Ralphs store to purchase groceries. JULIA WILLIAMS told OCSD Detectives that she and her husband manufactured the counterfeit checks and identification on the black HP laptop computer that was found during the search of their room. She also provided written consent for law enforcement to search the computer and other electronic items that were recovered in her room.

6. On March 20, 2015, I responded to the San Clemente Police Department and inspected the counterfeit currency. I determined that the bills were counterfeit and were manufactured using ink-jet technology. OCSD Detectives also showed me the counterfeit identification in the victim name of T.W. bearing the photograph of JULIA WILLIAMS and a torn check in that same name along with other counterfeit licenses, checks and information containing victim names, accounts, and social security numbers.

CONCLUSION

7. Based on the foregoing facts, and upon my training and experience, I believe that there is probable cause to believe that JEREMY WILLIAMS manufactured counterfeit currency in violation of Title 18, United States Code, Section 471. I declare under the penalty of perjury that the foregoing is true and correct.



Jason Warren
Special Agent
U.S. Secret Service

Sworn to and subscribed before me
This 23rd day of March, 2015

Jay C. Gandhi

United States Magistrate Judge